

polymer. It is thus argued that the teaching in the reference renders obvious the subject matter of Claims 62-67.

Applicants agree that Inoue et al. has considerable disclosure about hydrophobic polymers and hydrophilic polymers in the same imaging layer. What Inoue et al. fails to teach or suggest, however, is which hydrophilic polymer and hydrophilic polymers should be chosen and used in combination in a manner that provides a radiation-sensitive layer that is "aqueous-ineluable" in a dried state. As pointed out on page 9 (lines 16-22) of the present application, this means that the dried coating is not dissolved or otherwise dispersible by an aqueous eluent. Thus, unexposed regions of the imaged layer remain hydrophilic and receptive to the fountain solution that is used during on-press development and printing. However unexposed regions are not dissolved or removable by the fountain solution in the dried state (see lines 9-11 of page 22 of the present application). The invention of Claims 62-67 therefore provides much more flexibility in choosing a substrate for other reasons than its hydrophilicity (see lines 11-15 of page 19 of the present application).

In contrast, Inoue et al. has extensive teaching about the use and treatment of the preferred aluminum substrates including treatments to improve their water retention [0154]. This teaching is clearly not directed to providing an on-press developable radiation-sensitive lithographic printing precursor that requires a radiation-sensitive coating that is aqueous ineluable as a dried coating. There is no appreciation in Inoue et al. of this feature from either the teaching of the substrate or of the composition of the radiation-sensitive coating.

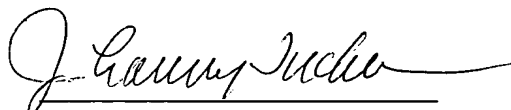
While Inoue et al. describes a wide variety of hydrophobic and hydrophilic polymers that are used together in the imaging layer, there is no direction given to picking out only those hydrophobic polymers and hydrophilic polymers that, when combined, will provide an aqueous-ineluable coating as required by the present invention. It would be merely serendipitous if a random combination of materials taught in Inoue et al. would have Applicants' required property. The teachings in the examples of Inoue et al. provide no guidance towards Applicants' required combination of materials and resulting property. None of the polymers described in those examples were prepared using monomers containing carboxy groups. Thus, the teaching in Inoue et al. amounts to two extensive laundry lists of polymers but omits the critical teaching that

would suggest putting specific ones together from each list as Applicants have done because Inoue et al. fails to appreciate the value of having unexposed regions that are aqueous-insoluble to avoid the need for highly hydrophilic substrates.

For these reasons, Inoue et al. does not teach or suggest the subject matter of Claims 62-67 and the unpatentability rejection should be withdrawn.

In view of the foregoing remarks, reconsideration of this patent application is respectfully requested. A prompt and favorable action by the examiner is earnestly solicited.

Respectfully submitted,

A handwritten signature in cursive script, reading "J. Lanny Tucker", written over a horizontal line.

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